

UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----  
SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

No. 1:23-cv-5749

v.

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
*PRO HAC VICE***

RICHARD J. SCHUELER, a/k/a RICHARD HEART,  
HEX, PULSECHAIN, and PULSEX,

Defendants.  
-----

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto, I Nicolas Morgan will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, an attorney employed by Investor Choice Advocates Network and a member in good standing of the bar of the State of California, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for *Amicus Curiae* PulseChain Foundation DAO. There are no pending disciplinary proceedings against me in any state or federal court.

Dated: May 1, 2024  
Ventura, CA

By: /s/ Nicolas Morgan  
Nicolas Morgan  
453 S. Spring Street, Suite 400  
Los Angeles, CA 90013  
Telephone: (310) 849-0384  
Nicolas.Morgan@icanlaw.org

*Attorney for Amicus Curiae PulseChain  
Foundation DAO*